

1 DAVID L. SCHRADER (State Bar No. 149638)
2 ALLISON N. SHUE (State Bar No. 193527)
3 MORGAN, LEWIS & BOCKIUS LLP
4 300 South Grand Avenue, Twenty-Second Floor
5 Los Angeles, CA 90071-3132
6 Tel: 213.612.2500
7 Fax: 213.612.2501

8 Attorneys for Claimants
9 Midway Sunset Cogeneration Company and
10 Aera Energy LLC

FILED
Clerk of the Superior Court

JUL 25 2006

By: K SANDOVAL, Deputy

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN DIEGO

14 (UNLIMITED JURISDICTION)

15 Coordination Proceeding Special Title (Rule
16 1550(b)):

17 NATURAL GAS ANTI-TRUST CASES
18 I, II, III & IV,

19 This Document Relates to:

20 *Sweetie's, et al. v. El Paso Corporation, et al.*, Case
21 No. 319840 (San Francisco Superior Court);
22 *Continental Forge Company v. Southern California*
23 *Gas Co., et al.* (Los Angeles Superior Court) Case
24 No. BC241951;
25 *City of Long Beach v. Southern California Gas Co.,*
26 *et al.* (Los Angeles Superior Court) Case No.
27 BC247114;
28 *City of Los Angeles v. Southern California Gas Co.,*
et al. (Los Angeles Superior Court) Case No.
BC247215;
Phillip v. El Paso Merchant Energy LP (San Diego
Superior Court) Case No. GIC 759425;
Phillip v. El Paso Merchant Energy LP (San Diego
Superior Court) Case No. GIC 759426,

J.C.C.P. Nos. 4221, 4224, 4226 & 4228

The Honorable Ronald S. Prager
Coordination Trial Judge

**JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING EXTENSION OF
TIME FOR DISCUSSIONS
REGARDING DISTRIBUTION OF
SETTLEMENT FUNDS**

25 WHEREAS, on June 29, 2006, the Settlement Claims Administrator (the "Claims
26 Administrator") and certain claimants from the Non-Core Natural Gas Subclass identified below
27 in connection with their undersigned counsel (the "Claimants") in the above-captioned matter

28 I-LA/894250.1

1 Administrator's recommended distribution of settlement funds;

2 WHEREAS, the Court requested that the parties meet and confer by July 21, 2006,
3 regarding a compromise as to the distribution of the settlement funds, and if an agreement is not
4 reached, to set a briefing schedule and contact the Court no later than July 27, 2006, to confirm
5 the briefing dates;

6 WHEREAS, the parties have met and conferred regarding a compromise as to the
7 distribution of the settlement funds. No agreement has been reached yet; however, the parties are
8 continuing their discussions and are considering a potential mediation of their dispute.

9 NOW, THEREFORE, the parties respectfully request that, in order to allow additional
10 time to continue these discussions, the Court agree to extend the date by which they are to submit
11 a proposed briefing schedule if an agreement is not reached, from July 27, 2006, to August 24,
12 2006.

13 Dated: July 24, 2006

MORGAN, LEWIS & BOCKIUS LLP

14
15 By David L. Schrader / MLS

16 David L. Schrader
17 Attorneys for Claimants
Midway Sunset Cogeneration Company
and Aera Energy LLC

18 Dated: July 27, 2006

BAKER KEENER & NAHRA LLP

19
20 By Robert C. Baker

21 Robert C. Baker
22 Attorneys for Claimants Sargent Canyon
Cogeneration Company, Coalinga
23 Cogeneration Company, Mid-Set
Cogeneration Company, Salinas River
24 Cogeneration Company, Sycamore
Cogeneration Company, and Kern River
25 Cogeneration Company
26
27

1 Dated: July 21, 2006

THELEN REID & PRIEST LLP

2
3 By Daven G. Lowhurst

Daven G. Lowhurst
Attorneys for Claimants
Shell California Pipeline Company LLC
and Equilon Enterprises LLC

4
5
6 Dated: July __, 2006

POORMAN-DOUGLAS CORPORATION

7
8
9 Gene Kennedy
El Paso Settlement – Settlement Claims
Administrator

10
11 **ORDER**

12 **IT IS HEREBY ORDERED:**

13 In order to allow additional time for settlement discussions, the date by which the parties
14 are to submit a proposed briefing schedule if an agreement regarding distribution of the
15 settlement funds is not reached is hereby extended from July 27, 2006, to September 7, 2006.

16
17 **JUL 28 2006**

18 Honorable Ronald S. Prager
Coordination Trial Judge
Superior Court of the State of California
County of San Diego

1 Dated: July __, 2006

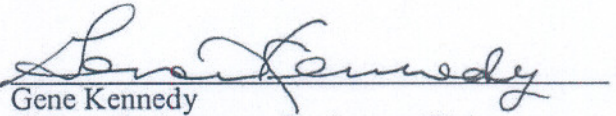
THELEN REID & PRIEST LLP

3 By _____

4 Daven G. Lowhurst
5 Attorneys for Claimants
6 Shell California Pipeline Company LLC
7 and Equilon Enterprises LLC

6 Dated: July 21, 2006

POORMAN-DOUGLAS CORPORATION

8 
9 _____

10 Gene Kennedy
11 El Paso Settlement – Settlement Claims
12 Administrator

11 **ORDER**

12 **IT IS HEREBY ORDERED:**

13 In order to allow additional time for settlement discussions, the date by which the parties
14 are to submit a proposed briefing schedule if an agreement regarding distribution of the
15 settlement funds is not reached is hereby extended from July 27, 2006, to September 7, 2006.

17 _____
18 Honorable Ronald S. Prager
19 Coordination Trial Judge
20 Superior Court of the State of California
21 County of San Diego